

**LAW OFFICES OF  
WONG, WONG & ASSOCIATES, P.C.**

RAYMOND H. WONG \*  
VALERIE Y. C. WONG \*

ANTONY LEMBERSKY \*  
NATALYA RUTCHYK \*  
EFRAIM S. LIPSCHUTZ ‡  
ROBERT JUN ‡

150 BROADWAY, SUITE 1588  
NEW YORK, NY 10038  
PHONE: (212) 566-8080  
FACSIMILE: (212) 566-8960

NEW JERSEY OFFICE  
12 ROSZEL RD, STE A102  
PRINCETON, NJ 08540  
PHONE: (609) 520-1668  
FACSIMILE: (609) 520-1168

\* MEMBER NY & NJ BARS  
# MEMBER NY & CT BARS  
‡ MEMBER NY BAR

November 1, 2018

**VIA ECF Filing**

Hon. Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: Huang v. WCJ Seafood Restaurant, et al.  
Case No.: 1:14-cv-00653(VEC)**

Dear Judge Caproni:

This Firm formerly represented Plaintiff Wen Bin Huang (“Huang” or the “Plaintiff”) in the above captioned action. This letter is made pursuant to Court Order dated October 24, 2018 [ECF Doc. No. 266] and in response to Plaintiff’s letter dated October 31, 2018 [ECF Doc. No. 271]. This Firm respectfully requests that the Plaintiff provide the demanded response to this Firm’s Interrogatory.

Plaintiff is misconstruing this Firm’s demand; we are not saying the Interrogatory responses were not verified, however the response to ostensibly the most important Interrogatory is deficient.

As explained in this Firm’s previous letter, the outstanding Interrogatory requests, *inter alia*, the basis for alleging the Firm’s hours were unreasonable, excessive, and otherwise basis for bringing this ancillary action. In response, Plaintiff states “see bases, theories, and reasons stated in Dkt No. 258”. Document No. 258 is Plaintiff’s Trial Memorandum. The issue is that Document No. 258 is not a verified document and pointing this Firm to such document does not provide this Firm with a verified document. Since there are no depositions in this ancillary action, a sworn statement laying out the grounds for Plaintiff’s “grievances” against the Firm is of the utmost importance and necessity.

While Document No. 258 is “Plaintiff’s” memo, it is not a verified document any more than any letter submitted by her counsel.

This Firm demanded, and still does, that Plaintiff correct this issue. Plaintiff can either provide a verification for Document No. 258, which if she claims she was previously incorporating the document by reference should be simple; or provide a separate detailed response to the outstanding Interrogatory.

Accordingly, this Firm requests that Plaintiff respond and cure the deficiency. In the alternative, Wong Wong requests a telephone conference to resolve this issue.

Thank you for your time and attention. Please do not hesitate to contact the undersigned if you have any questions.

Respectfully submitted,  
Wong, Wong & Associates, P.C.  
/s/Antony Lembersky  
Antony Lembersky, Esq. (AL5885)  
*Former Attorneys for Plaintiff*  
150 Broadway, Suite 1588  
New York, New York 10038  
Tel: (212) 566-8080  
Fax: (212) 566-8960